

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

IN RE: **CB CHATHAM, LLC**
Debtor(s)

) **CASE NO. 20-12452 SAH**
) **CHAPTER 7**

**APPLICATION OF TRUSTEE TO EMPLOY ATTORNEY AND NOTICE OF
OPPORTUNITY FOR HEARING**

NOTICE OF OPPORTUNITY FOR HEARING

Your rights may be affected. You should read this document carefully and consult your attorney about your rights and the effect of this document. If you do not want the court to grant the requested relief, or you wish to have your rights considered, you must file a written response or objection to the requested relief with the Clerk of the United States Bankruptcy Court for the Western District of Oklahoma, 215 Dean A McGee Avenue, Oklahoma City, OK 73102 no later than 14 days from the date of filing of this request for relief. You should also serve a file-stamped copy of your response or objection to the undersigned movant/movant's attorney [and others who are required to be served] and file a certificate of service with the court. If no response or objection is timely filed, the Court may grant the requested relief without a hearing or further notice. **The 14 day period includes the three (3) days allowed for mailing provided for in Bankruptcy Rule 9006(f).**

COMES NOW, Ginger D. Goddard, Trustee ("Trustee"), and respectfully represents:

That she is duly appointed Trustee in the captioned bankruptcy. That it is necessary for the Trustee to employ the services of an attorney in the performance of her duties, including recovering property of the estate, selling property of the estate, objecting to abandonment of property, objecting to claims of creditors, negotiating, filing pleadings, and otherwise litigating as necessary. The Trustee also needs legal services in preparation of reports and sundry miscellaneous matters relating to the administration of the estate. Trustee seeks representation as to all legal matters pertaining to this bankruptcy estate, including but not limited to required adversaries and appellate representation.

That, Ginger D. Goddard, attorney at law, a member in good standing of the Bar of the State of Oklahoma, and duly admitted to practice before this Court, represents no interest adverse to the Trustee.

It is contemplated that Ms. Goddard will seek compensation based on her normal usual

billing rate for such services in the amount of \$250.00 per hour effective on or about this date.

The Trustee anticipates that it will take approximately 20 hours of attorney services to conclude this administration. Additionally, it is contemplated Ginger D. Goddard shall seek to recover costs expended in representing the Trustee.

WHEREFORE, Trustee, Ginger Goddard, prays that this Court enter an Order authorizing the Trustee to retain Ginger D. Goddard as attorney for the Trustee at the rate of \$250.00 per hour subject to Court's approval.

Respectfully submitted,
/s/ Ginger D. Goddard
Ginger D. Goddard, OBA 3416, TRUSTEE
224 W. Gray Street, Suite 202
Norman OK 73069
(405) 329-5297 fax 310-6379
gingergoddard@cox.net

VERIFIED STATEMENT

Ginger D. Goddard hereby makes the following Verified Statement in compliance with Fed.R.Bankr.P. 2014(a):

To the best of my knowledge, information and belief, I have no connection with the debtor, creditor, or other parties in interest, their respective attorneys or accountants, the United States Trustee, or any person employed in the office of the United States Trustee, which will disqualify Ginger D. Goddard from serving as counsel for the Trustee and the estate.

I, Ginger D. Goddard, verify under penalty of perjury that the foregoing is true and correct.

Executed on: August 5, 2020

/s/Ginger D. Goddard
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